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Steven Z. Legon
Of Counsel

March 25, 2022

Hon. Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Matthew Ziburis*, Docket No. 22-mj-257 (MMH)

Dear Judge Henry:

This letter motion is respectfully submitted to request a temporary modification of the conditions of release, to permit for an extension of two weeks time for the defendant, Matthew Ziburis, to be able to fulfill the conditions of his appearance bond in this matter.

On. March 16, 2022, the defendant, Matthew Ziburis, was ordered released pursuant to the conditions of an appearance bond in the amount of \$500,000, which requires, *inter alia*, that he post \$15,000 cash with the court, as well as real property belonging to his mother, which is located at 9550 Cove Drive, Unit D20, Royalton, Ohio.

On Wednesday, March 23, 2022, Matthew Ziburis posted \$15,000 with the Clerk of the Court for the Eastern District of New York. However, due to a number of logistical difficulties, Mr. Ziburis has not yet been able to obtain a confession of judgment from his mother for her real property to be posted as part of his bail package. Matthew Ziburis' mother is an elderly woman who suffers from several debilitating, chronic health issues, and just this past week, related to counsel that she was suffering from cold and flu like symptoms. Additionally, because the property is located in Ohio, that state's laws concerning confession of judgment govern, so retention of local counsel may be necessary.

The government has been informed of defense counsel's intention to file this motion, and does not have any objection.

Respectfully,

Anthony L. Ricco

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cc: A.U.S.A. Alexander Solomon (By E.C.F.)
cc: A.U.S.A. Emily Dean (By E.C.F.)